



Filed Via ECFS

February 3, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Aequus Technologies Corporation (“Aequus”) hereby requests confidential treatment for the attached Application for Certification Renewal. This Application contains company-specific, proprietary commercial information that is not routinely available for public inspection and is safeguarded from competitors. Accordingly, it should be protected from disclosure pursuant to 47 C.F.R. § 0.457(d) and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). A copy of this letter with the redacted version of the Application will be filed under CG Docket No. 10-51.

Below please find a statement of the reasons for withholding the materials from inspection as well as relevant facts surrounding this request.

1. Identification of the specific information for which confidential treatment is sought. Aequus requests that the attached Application marked in entirety as “CONFIDENTIAL – NOT FOR PUBLIC INSPECTION” be treated as confidential.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission. Aequus is providing this information per the requirements of 47 C.F.R. §64.606, Internet-based TRS Provider and TRS Program Certification.

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged. The information at issue is highly confidential and specific to Aequus, detailing information related to its TRS operational, functional and technological capabilities. This information is sensitive for competitive reasons. It is safeguarded from competitors and is not made available to the public. If this information is not protected, other VRS providers may utilize it to compete against Aequus.

4. Explanation of the degree to which the information concerns a service that is subject to competition. The information provided concerns a service provided by Aequus that is subject to substantial competition.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of this information could cause substantial competitive harm to Aequus, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against Aequus and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure.

Aequus routinely treats this information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. Aequus does not make this information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure. Aequus requests that this information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Aequus.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted. This confidential information is being provided in accordance with the requirements of 47 C.F.R. §64.606. If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow Aequus to take appropriate steps to safeguard the confidentiality of the information.

If there are any questions regarding this request, please do not hesitate to contact me.

Sincerely,

/s/

Nancy J. Bloch
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On behalf of Aequus Technologies Corporation
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cc: Joel Gurin, Chief, Consumer and Governmental Affairs Bureau – via email
William Freedman, Deputy Chief, Consumer and Governmental Affairs Bureau – via email
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Gregory Hlibok, Chief, Disability Rights Office, CGB – via email